UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: ECL-115

April 7, 2006

James M. Anderson
DEQ Northwest Region
Portland Harbor Section
2020 SW Fourth Ave, Suite 400
Portland, OR 97201

RE: Source Control Decision
Ro-Mar Site
9333 N. Time Oil Road, Portland, OR
ECSI #2437

Dear Mr. Anderson:

EPA has reviewed DEQ's Source Control Decision (SCD) Memorandum for the Ro-Mar Site referenced above. Based on the information provided in this document, EPA cannot agree with DEQ's determination that this facility does not appear to be a current source of Willamette River water or sediment contamination. Until the following questions and comments regarding this source control decision are addressed, EPA will consider the Ro-Mar site as a potential source of contamination to the Portland Harbor Superfund Site. We provide the following comments for DEQ to consider in proceeding forward with its decisions regarding this site.

Contaminants of Interest

The Source Control Decision document did not fully explain why DEQ chose the contaminants of interest and should do so.

1. Why were cadmium, chromium and lead analyzed, but not other metals? Both copper and zinc have been known contaminants for transportation facilities (e.g., copper in brake pads, copper and zinc in roof drains).

2. Why was TPH analyzed for only a few samples (GP-6, CB-1 and CB-2)? Unknown spills of petroleum hydrocarbons could have occurred in the storage yard.

3. Why weren't the samples in CB-1 and CB-2 analyzed for phthalates? Phthalates are found in used cutting oils, engine oils, car wash products and tire dressings, brake pads, road dust, tires, packing peanuts, used cigarette butts, inks, asphalt sealants, windshield fluids, or marine grey water.

4. Are any pesticides or herbicides used at this property, especially on the eastern portion of the land?

Storm Water

The Source Control Decision document does not fully explain the storm water pathway (Refer to Section 7.1.2.2 of the PH JSCS).

1. How does the property drain on the eastern portion of the property? Is the purpose of the Swale next to N. Time Oil Road to collect runoff from the property, runoff from the road, or both?

2. If storm water runoff from the eastern portion of the property does drain into the Swale next to N. Time Oil Road, why weren't any samples collected in the swale?

3. Figure 2 only shows the catch basins and directional runoff flow on the western portion of the property. It would be better to show the drainage basins for each catch basin in the figure. How are catch basins and manholes connected in the storm water conveyance system and where are discharge(s) to the River located? Are there any other connections to these pipes?

4. Why were only CB-1 and CB-2 sampled? How are these representative of all the catch basins?

5. Why weren't storm water samples collected during a storm event? Catch basin solids only contain coarser sediment fractions. While catch basin solids data is a good screening tool, higher concentrations can be found in finer solids. Many contaminants are known to be attached to the finer sediments that flush through the system during storm events.

6. Why are total PCB results 0.0? Were the samples analyzed for total PCBs or was the conclusion "0.0" because there were no detects for the aroclors? If samples were analyzed for total PCBs, what was the detect level? Why weren't they reported as other chemicals (i.e., less than detect level)?

7. What is the loading potential of contaminants from this site to the Willamette River?

8. The SCD states that the facility cleans the catch basins annually. Are there any other BMPs employed at the site?

Soils

Source Control Document does not fully evaluate soils pathways (Refer to Section 7.1.2.3 of the PH JSCS).

1. The sampling strategy used to determine areas of contaminated soils on the eastern portion of the property is not adequate to find all potentially contaminated soils, especially since historic activities would likely have resulted in "hot spots" of contamination across area. The sampling strategy used has allowed for "hot spots" to remain at the site in-between sampling locations. A better sampling approach is outlined in EPA's guidance *Superfund Lead-Contaminated Residential Sites Handbook* (OSWER Directive 9285.7-50, August 2003). Even though this guidance was written for residential site and lead contamination, it is based on several other EPA guidance documents that are directly applicable to this site: EPA applies many of the principles of this document at commercial/industrial sites and uses them to assess the extent other contaminants. This guidance provides the following approach to sampling design:

   > The property should first be sectioned off into a grid (e.g., 8 sections). Within each section, a series of random grab samples (~8-10) should be collected and sent to a laboratory for analysis. The location of the grab samples should be recorded (e.g., place flags and take a picture, draw a map, etc.) At the lab, each grab sample for a section should be split and one-half added to a section composite and the other half archived. The composite sample should be analyzed and if below SLVs then the section is no further of concern. If the composite sample for a section is greater than the SLVs, then the archived samples for that section can be analyzed to further identify the extent of the contamination.

2. Why did DEQ only retain PCBs for soil evaluation? Pb exceeded SLVs at GP-5 and GP-6, but this was not mentioned in the SCD. The confirmation samples at GP-6 did not include Pb, so it is not clear if the removal was adequate for all contaminants. Why weren't soils removed at GP-5?

3. PCBs exceeded SLVs at GP-4 and GP-5. Why weren't soils removed in those areas?

4. How was the soil sample depths determined? Why not sample at greater depths?

5. A figure depicting the estimated horizontal and vertical extent of contamination was not provided in the SCD.

6. Did DEQ only consider sheet flow from east to west properties? What about other activities (e.g., driving on eastern lot, wind erosion) that could provide migration of contaminants to other catch basins?

EPA appreciates DEQs understanding in the additional week used to provide these comments. If you have any questions regarding this letter or would like to have further discussions regarding this site, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine Koch
Remedial Project Manager
U.S. Environmental Protection Agency